

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

| | | |
|-----------------------|---|--------------------|
| IN RE: |) | |
| |) | Chapter 11 |
| DYNAMIC INTERNATIONAL |) | |
| AIRWAYS, LLC |) | Case No.: 17-10814 |
| |) | |
| Debtor. |) | |

LIMITED
OBJECTION TO DEBTOR'S EMERGENCY MOTION SEEKING INTERIM AND
FINAL ORDERS REGARDING POST-PETITION FINANCING

NOW COMES Worldwide Flight Services, Inc. ("WFS"), by and through counsel, and for its objection to the Debtor's July 19, 2017 Emergency Motion Seeking Interim and Final Orders (1) Authorizing Debtor to Obtain Post-Petition Financing, (2) Granting Liens and Super Priority Administrative Expenses, and (3) Setting and Prescribing the Form and Manner of Notice for a Final Hearing (the "Motion") states as follows:

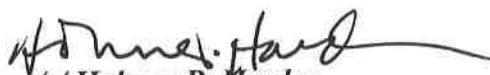
1. WFS is a provider of passenger services to the Debtor at John F. Kennedy International Airport.
2. WFS holds a possessory lien on a deposit (the "Deposit") to secure payment for its services. Unpaid pre-petition invoices submitted by WFS to the Debtor as of the date of the petition exceed the amount of the Deposit.
3. WFS objects to the Motion to the extent that the Motion may seek to impair WFS' security interest in the Deposit by, *inter alia*, granting a priming or junior lien therein, and/or to the extent the Motion may seek to impair WFS' rights with respect to the Deposit including (without limitation) WFS' rights of recoupment and/or setoff.

4. WFS reserves the right to supplement and amend this limited objection, to join in objections filed by others, and to raise additional objections at the hearing.

WHEREFORE, WFS requests that any order approving post-petition financing specify that the Deposit does not constitute collateral for any DIP Loan, and that WFS' rights regarding the Deposit (including, without limitation, its rights of recoupment and/or setoff) are unimpaired. WFS also requests such other and further relief as this Court deems proper.

Respectfully submitted this the 21st day of July, 2017.

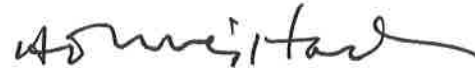
WILLIAMS MULLEN


By: /s/ Holmes P. Harden
Holmes P. Harden
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CERTIFICATE OF SERVICE

I, Holmes P. Harden, do hereby certify that the foregoing ***Limited Objection to Debtor's Emergency Motion Seeking Interim and final Orders*** was served upon all parties of record as indicated below either by electronic service via the CM/ECF system, electronic mail or by mailing a copy thereof at the addresses indicated below with the proper postage attached and deposited in an official depository under the exclusive care and custody of the United States Postal Service in Raleigh, North Carolina, on the 21st day of July, 2017.

WILLIAMS MULLEN



BY: /s/ Holmes P. Harden

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